IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

CRIMINAL NO. 06-50 (GMS)

ASHLEY HARRISON

v.

## **DEFENDANT ASHLEY HARRISON'S MOTION FOR ENLARGEMENT OF TIME**

Defendant, Ashley Harrison, by and through her counsel, Johanna E. Markind, Esquire, hereby moves this Honorable Court for an enlargement of time to respond to the government's motion for the reasons set forth below:

- 1. At the pre-trial conference in this matter on April 23, 2007, the Court directed the government to brief the admissibility of taped telephone conversations involving defendant or defendants in this matter by April 26, 2007.
- 2. After the government was granted an enlargement of time to file its motion, the deadline for Harrison to submit a response was extended to May 8.
- 3. Since that time, undersigned counsel has been overwhelmed with discovery issues for two civil cases having a May 7 discovery deadline.
- 4. Undersigned counsel therefore requests additional time, from May 8 to May 14, to file a response to the government's motion.
- 5. Counsel has contacted government counsel about this request. The government does not oppose the request.

WHEREFORE, the defendant Ashley Harrison respectfully requests that this motion be granted.

Respectfully submitted,

Johanna E. Markind, Esquire

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date I served a copy of the foregoing motion upon the following persons by United States first class mail, postage pre-paid, to:

Douglas E. McCann, Esquire (AUSA) U. S. Attorney's Office The Nemours Building 1007 Orange Street, Suite 700 P.O. Box 2046 Wilmington, DE 19899

Elliott M. Cohen, Esquire 15<sup>th</sup> Street & John F. Kennedy Boulevard Suite 1516 Philadelphia, PA 19102

Date: May 4, 2007

Johanna E. Markind, Esquire 1500 Walnut Street – Suite 1100

Philadelphia, PA 19102

(215) 546-2212

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA	:
V.	: CRIMINAL NO. 06-50 (GMS) :
ASHLEY HARRISON	: ORDER
	ORDER
AND NOW, this day of	, 2007, upon consideration of defendant
Ashley Harrison's motion for enlargement	nt of time to respond to the government's motion, it is
hereby ORDERED that the motion is GR	ANTED, as follows: Harrison has until May 14, 2007,
to file a response to the government's mo	tion.
	BY THE COURT:
	Honorable Gregory M. Sleet, U.S.D.J.